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Attorneys for Plaintiff
Landmark Collection Services, Inc.

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
SANTA ANA DIVISION

| | | | |
|------------------------------|---|-------------------------------|------------------|
| IN RE: |) | Case No. | 8:22-bk-11375-SC |
| |) | | |
| BRYAN APPIO fka BRYAN LEWIS |) | Chapter 7 | |
| |) | | |
| Debtor |) | | |
| |) | | |
| LANDMARK COLLECTION |) | Adv.Pro.No. | 8:23-ap-01026-SC |
| SERVICES, INC. |) | | |
| |) | | |
| Plaintiff, |) | STIPULATION TO CONTINUE TRIAL | |
| |) | DATE AND ASSOCIATED DEADLINES | |
| v. |) | | |
| |) | | |
| BRYAN APPIO fka BRYAN LEWIS, |) | Trial Date: October 21, 2024 | |
| |) | Time: 9:30 a.m. | |
| |) | Ctrm: 5C | |
| Defendant |) | Place: 411 W. Fourth Street | |
| |) | Santa Ana, CA 92701 | |

TO THE COURT AND ALL INTERESTED PARTIES:

Plaintiff Landmark Collection Services, Inc., and Defendant Bryan Appio by and
through their respective counsel hereby stipulate to continue the trial for a period of least 45
days for the following reasons:

1 Plaintiff's complaint states four claims for relief: First and Second Claims for
2 nondischargeability under 11 U.S.C. § 523(a)(6), and the Third and Fourth Claims for Relief
3 in the Complaint for Denial of Discharge under 11 U.S.C. §§ 727(a)(2) and 727(a)(4)(A).
4 Trial is currently set on the Third and Fourth Claims for October 21, 2024, the other claims
5 having been held in abeyance pending resolution the § 727 claims.
6

7 The parties participated in a mediation session on October 2, 2024 with James R.
8 Felton, Esq. and made substantial progress on settling all claims asserted in the complaint.
9 The parties have agreed to continue with the mediation discussions with Mr. Felton. If
10 successful, the settlement will need to be memorialized in writing and, since this case
11 involves 727 claims, a motion for approval will need to be noticed, with service on all
12 creditors in the case.
13
14

15 Accordingly, the parties respectfully request a continuance of the trial date to try to
16 resolve the claims and filed the appropriate motion.
17

18 Respectfully submitted,

19 LAW OFFICES OF ROUSE & BAHLERT

20 Dated: October 2, 2024

21 By: /s/ Cheryl C. Rouse
22 Cheryl C. Rouse, Esq.
23 Attorneys for the Plaintiff

24 KHANG & KHANG LLP

25 Dated: October 2, 2024

26 By: Joon M. Khang
27 Joon M. Khang, Esq.
28 Attorneys for the Defendant